REMARKS

By this Amendment, claims 1-17, 19-20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58 are amended. Claim 18 remains in the application. Thus, claims 1-20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58 are active in the application. Reexamination and reconsideration of the application are respectfully requested.

On page 2 of the Office Action, claims 1-3, 5-7, 9-11, 13-15, 17-18, 20, 24, 28, 32, 36, 39, 43, 50, 54 and 58 were rejected under 35 U.S.C. § 102(a) as being anticipated by the Applicants' Admitted Prior Art (AAPA), as disclosed in page 26, lines 13-26 of the October 7, 2005 Amendment, which is substantially identical to the Description of the Related Art section of the specification (see line 12 on page 1 to line 8 on line 3 of the substitute specification, which corresponds line 13 on page 1 to line 1 on page 4 of the original specification).

Without intending to acquiesce to this rejection, independent claims 1, 5, 9, 13, 17, 20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58 have each been amended in order to more clearly illustrate the marked differences between the present invention and the applied reference. Accordingly, for the reasons presented below, the Applicants respectfully submit that the present invention is clearly patentable over the applied reference.

The Applicants thank the Examiner and Examiner Donaghue for kindly conducting the interview with the Applicants' undersigned representative on March 30, 2006. Although no agreement on the patentability of the claims could be reached, the Applicants appreciate the Examiner's comments on her interpretation of the AAPA in view of the claimed invention.

The AAPA provides conventional mobile Internet services that include a mail gateway, a mail terminal and a mail server, where the mail gateway relays e-mail between the mail terminal and the mail server. In the AAPA, the mail terminal does not transmit an attachment to the mail server when transmitting an e-mail to the mail server. Instead, when receiving an acquisition request for the e-mail, which is received by the mail server from the mail terminal, the mail gateway acquires the e-mail from the mail server, separates an attached file from the e-mail, stores the separated file having a mail ID, and manages the file. When receiving e-mail (consisting of the main body and a mail ID for identifying the original mail) that should be forwarded to another address from the mail terminal, the mail gateway of the AAPA attaches the stored and managed attached file to the e-mail on the basis of the mail ID for identifying the original mail and sends the e-mail consisting of the main body and the attached file to the mail

server. The AAPA thus enables the mail terminal to send e-mail with an attached file to a forwarding address only by sending e-mail having a mail ID for identifying the original mail to the mail gateway.

However, each attached file in an e-mail includes the same mail ID in the AAPA. Accordingly, when a plurality of attached files are included in an e-mail, there is a problem in that a file to be attached cannot be selected from the plurality of attached files because all files included in the e-mail are unconditionally attached to the e-mail and a common mail ID is used for linking the e-mail and the attached files. Therefore, in the AAPA, it is impossible to send e-mail including an attached file that a user selects from among a plurality of attached files without attaching the attached file by the mail terminal.

In the March 30, 2006 interview, the Applicants' representative asserted that the AAPA discloses that one or more files attached to an e-mail each contain the same e-mail ID associating the attached files with the e-mail. Since the AAPA discloses that each of the attached files include the same e-mail ID, the Applicants' representative asserted that the attached files cannot be distinguished from each other based on the e-mail ID. Furthermore, the Applicants' representative asserted that the AAPA does not disclose or suggest that files attached to an e-mail include a file ID individually identifying each attachment so that a user of a mail terminal can select an attached file among a plurality of attached files based on file IDs of the attached files.

However, with regard to claim 1 as presented in the October 7, 2005 Amendment, the Examiner asserted that the AAPA anticipates this claim because the attached file holding unit of the mail server was recited as holding "one or more attached files in the e-mail." The Examiner asserted that if only one attachment is included in an e-mail, an e-mail ID, even though it is common to all attachments, as is disclosed in the AAPA, is equivalent to a file ID of a single attachment because an e-mail ID for a single attachment can be used to identify this single attachment. Based on an interpretation of claim 1 as requiring that the attached file holding unit holds only one attachment, the Examiner asserted that the identifier generation unit of the mail gateway will generate only one file ID which would correspond to the e-mail ID of the AAPA, because an e-mail of the AAPA with a single attached file having an e-mail ID associating it with the e-mail uniquely identifies the single attachment.

Independent claims 1, 5, 9, 13, 17, 20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58 have each been amended to more clearly illustrate the marked differences between the present invention and the applied references.

In particular, claims 1, 5, 9, 13, 17, 20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58 each have been amended to recite that an e-mail addressed to a user of the mail terminal includes a plurality of attached files.

Furthermore, claims 1, 5, 9 and 13 have each been amended to recite that the mail gateway comprises an identifier generation unit operable to generate a unique identifier for each of a plurality of attached files held by the attached file holding unit, respectively, of either the mail server or the mail gateway, and a reception unit operable to receive an attached-file specifying e-mail transmitted from the mail terminal, where the attached-file specifying e-mail includes at least one identifier among the unique identifiers generated by the identifier generation unit for each of the plurality of attached files held by the attached file holding unit.

In addition, claims 1, 5, 9 and 13 have each been amended to recite the mail gateway as comprising an attached file acquisition unit operable to acquire at least one attached file from the attached file holding unit, where the at least one attached file corresponds to the at least one identifier included in the attached-file specifying e-mail received by the reception unit. Furthermore, claims 1, 5, 9 and 13 have each been amended to recite the mail gateway as comprising a construction unit operable to construct a file attached e-mail by attaching the at least one attached file acquired by the attached file acquisition unit to the attached-file specifying e-mail received by the reception unit. The mail gateway is also recited in claims 1, 5, 9 and 13 as comprising a mail distribution unit operable to distribute the file attached e-mail constructed by the construction unit to a respective address on one or more receivers of the e-mail.

Accordingly, claims 1, 5, 9 and 13 each recite that each of the plurality of files attached to an e-mail has a unique identifier respectively generated therefor, and therefore, the identifier generation unit generates a plurality of respectively unique identifiers for each of the plurality of attached files. Therefore, a user of the mail terminal can specify at least one of the plurality of attached files in the e-mail based on the unique identifier which is respectively generated for each attached file. As a result, the inventions recited in claims 1, 5, 9 and 13 enable a user to select and receive an attachment among a plurality of attachments included in an e-mail based on the unique identifier that is generated for each attachment.

However, as described above, the AAPA assigns a common e-mail ID to all attachments. Therefore, the mail gateway of the AAPA clearly does not generate a unique identifier for each of the attached files held by an attached file holding unit, respectively, as recited in claims 1, 5, 9 and 13. Furthermore, the mail gateway of the AAPA does not receive an attached-file specifying e-mail transmitted from the mail terminal in which the attached-file specifying e-mail includes at least one identifier among the unique identifiers generated by the identifier generation unit for each of the plurality of attached files held by the attached file holding unit, as recited in claims 1, 5, 9 and 13. Moreover, the mail gateway of the AAPA clearly does not construct a file attached-file e-mail by attaching the at least one attached file which corresponds to the at least one unique identifier generated for the at least one attached file.

Accordingly, the AAPA clearly does not disclose or suggest the mail gateway as recited in claims 1, 5, 9 and 13.

Furthermore, for the same reasons described above, the Applicants respectfully submit that the AAPA clearly does not disclose or suggest generating a unique identifier for each of a plurality of attached files included in an e-mail, respectively, receiving an attached-file specifying email transmitted from the mail terminal, where the attached-file specifying email includes at least one identifier among the unique identifiers generated for each of the plurality of attached files, acquiring at least one attached file from the mail server, where the at least one attached file corresponds to the at least one identifier included in the received attached-file specifying e-mail, and constructing a file attached e-mail by attaching the acquired at least one attached file to the attached-file specifying e-mail, as recited in claims 20, 24, 28, 32, 39, 43, 50 and 54.

Therefore, for at least the foregoing reasons, claims 1, 5, 9, 13, 20, 24, 28, 32, 39, 43, 50 and 54 are clearly not anticipated by the AAPA since the AAPA fails to disclose each and every limitation of claims 1, 5, 9, 13, 20, 24, 28, 32, 39, 43, 50 and 54.

Claims 17, 36, 47 and 58 have each been amended to recite that a mail terminal receives a list of respectively unique identifiers from the mail gateway for each of a plurality of files included in an e-mail. Furthermore, claims 17, 36, 47 and 58 have each been amended to recite that the mail terminal prepares an attached-file specifying e-mail that includes at least one identifier selected by the user of the mail terminal among the unique identifiers from the identifier list as a substitute for at least one attached file that the user wants to attach to the e-

mail, where <u>the at least one identifier selected by the user corresponds to the least one attached</u> <u>file that the user wants to attach to the e-mail</u>.

As described above, the AAPA discloses that a mail terminal receives an e-mail with all attachments included in the e-mail and that a user of the mail terminal cannot select one of a plurality of attached files included in the e-mail since each of the attached files includes the same e-mail ID. Accordingly, the AAPA clearly does not disclose or suggest that a mail terminal receives <u>a list of respectively unique identifiers from the mail gateway for each of a plurality of</u> <u>files included in an e-mail</u>, and that the mail terminal prepares an attached-file specifying e-mail that includes <u>at least one identifier</u> selected by the user of the mail terminal <u>among the unique</u> <u>identifiers</u> from the identifier list as a substitute for at least one attached file that the user wants to attach to the e-mail, where <u>the at least one identifier selected by the user corresponds to the</u> <u>least one attached file that the user wants to attach to the e-mail</u>, as recited in claims 17, 36, 47 and 58.

Therefore, claims 17, 36, 47 and 58 are clearly not anticipated by the AAPA since the AAPA fails to disclose or suggest each and every limitation of claims 17, 36, 47 and 58.

Accordingly, for at least the foregoing reasons, the Applicants respectfully submit that claims 1, 5, 9, 13, 17, 20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58 are clearly not anticipated by the AAPA.

Furthermore, because of the clear distinctions described above, the Applicants respectfully submit that one skilled in the art would not have been motivated to modify the AAPA in such a manner as to result in, or otherwise render obvious, the inventions of claims 1, 5, 9, 13, 17, 20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58.

Therefore, the Applicants respectfully submit that claims 1, 5, 9, 13, 17, 20, 24, 28, 32, 36, 39, 43, 47, 50, 54 and 58, as well as claims 2-4, 6-8, 10-12, 14-16 and 18-19 which depend therefrom, are clearly allowable over the prior art as applied by the Examiner.
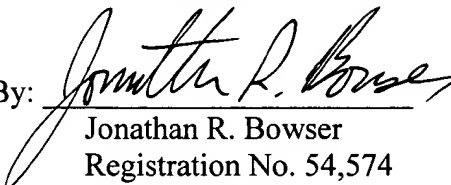
In view of the foregoing amendments and remarks, it is respectfully submitted that the present application is clearly in condition for allowance. An early notice thereof is respectfully solicited.

If, after reviewing this Amendment, the Examiner feels there are any issues remaining which must be resolved before the application can be passed to issue, the Examiner is respectfully requested to contact the undersigned by telephone in order to resolve such issues.

A fee and a Petition for a one-month Extension of Time are filed herewith pursuant to 37 CFR § 1.136(a).

Respectfully submitted,

Susumu KOBAYASHI et al.

By: _Jonathan R. Bowser_

Jonathan R. Bowser
Registration No. 54,574
Attorney for Applicants

JRB/nrj
Washington, D.C. 20006-1021
Telephone (202) 721-8200
Facsimile (202) 721-8250
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